



FEDERAL ELECTION COMMISSION
Washington DC 20463

THIS IS THE BEGINNING OF ADMINISTRATIVE FINE CASE # 2456

DATE SCANNED 10-5-11

SCANNER NO. 2

SCAN OPERATOR Jaw

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

2011 MAR 31 A 10:27

March 30, 2011

MEMORANDUM

SENSITIVE

TO: The Commission

THROUGH: Alec Palmer *AP*
Acting Staff Director

FROM: Patricia Carmona *PC*
Chief Compliance Officer

Debbie Chacona *DC*
Assistant Staff Director
Reports Analysis Division

BY: Jodi Winship/Sari Pickeral *JP*
Compliance Branch

SUBJECT: Reason To Relieve Recommendation – 2010 Year-End Report for the
Administrative Fine Program

Attached is a list of political committees and their treasurers who failed to file the 2010 Year-End Report in accordance with 2 U.S.C. 434(a). The Year-End Report was due on January 31, 2011.

The committees listed in the attached RTB Circulation Report either failed to file the report, filed the report more than five (5) days but no more than thirty (30) days after the due date (considered a late filed report), or filed the report more than thirty (30) days after the due date (considered a non-filed report). In accordance with the schedule of civil money penalties for reports at 11 CFR 111.43, these committees should be assessed the civil money penalties highlighted on the attached circulation report.

Recommendation

1. Find reason to believe that all other political committees and their treasurers listed on the RTB Circulation Report violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalties would be the amounts indicated on the RTB Circulation Report.
2. Send the appropriate letters.

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Federal Election Commission
Reason to Believe Circulation Report
2010 YEAR-END Not Election Sensitive 01/31/2011 H_S_P_UNAUTH

AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
2397	C00397083	AMERICAN TELESERVICES ASSOCIATION PAC		TIMOTHY SEARCY	\$171,491	0	2/17/2011	17	\$6,454	\$140
2398	C00413856	ASSOCIATIONS INC. PAC/ASSOCIA PAC		NANCY CUSHMAN	\$100,944	0	3/2/2011	30	\$13,715	\$260
2399	C00434324	BEN GRABER FOR CONGRESS	GRABER, BENJAMIN	BENJAMIN GRABER	\$146,008	0	2/27/2011	27	\$9,600	\$190
2400	C00118828	BOILERMAKERS LOCAL 85 FEDERAL POLITICAL ACTION COMMITTEE		FRED E. KEITH JR.	\$108,428	0	2/28/2011	28	\$874	\$165
2401	C00458349	BURRIS FOR SENATE	BURRIS, ROLAND W	RAYMOND DAVIS	\$162,061	0	2/7/2011	7	\$19,455	\$145

2403	C00486662	CHET D TRAYLOR FOR US SENATE CAMPAIGN	TRAYLOR, CHET D	LARRY W. PICKETT	\$191,340	0		Not Filed	\$95,670 (est)	\$3,850
2404	C00326066	CIRO RODRIGUEZ FOR CONGRESS	RODRIGUEZ, CIRO D.	LUIS R. VERA	\$3,294,855	0	2/13/2011	13	\$16,250	\$175
2405	C00467423	CITIZENS FOR CHRIS GEISSLER	GEISSLER, CHRISTOPHER TODD	MICHAEL JORUDD	\$109,380	0		Not Filed	\$21,872 (est)	\$550

2409	C00462531	COMMITTEE TO ELECT DR GREG RABIDOUX	RABIDOUX, GREG ROBERT JR	KIMBERLEE E. SMITH	\$158,153	0		Not Filed	\$3,119	\$250
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AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
2417	C00448241	DOUG TUDOR FOR CONGRESS	TUDOR, DOUGLAS DAVID	DOUGLAS D. TUDOR	\$103,206	3		Not Filed	\$12,901 (est)	\$962
2418	C00482588	DOUGHERTY SENATE CAMPAIGN COMMITTEE	DOUGHERTY, JOHN E III	DR. JODHA KHALSA	\$320,109	0	2/18/2011	18	\$9,744	\$145
2420	C00468694	ERIC WNUCK 2010	WNUCK, ERIC	ERIC WNUCK	\$434,191	1		Not Filed	\$108,548 (est)	\$6,187
2422	C00469247	FERRE 2010	FERRE, MAURICE	ELIZABETH M. TETREAU III	\$569,529	0	2/7/2011	7	\$11,994	\$145
2424	C00404350	FRESNO COUNTY DEMOCRATIC WOMEN'S CLUB/DEMOCRATS IN ACTION		HELEN WILSON	\$106,303	0	2/28/2011	28	\$8,669	\$195
2425	C00477646	FRIENDS OF DAVID MADEIRA	MADEIRA, DAVID JAMES	MICHAEL LACEY	\$120,785	0		Not Filed	\$30,196 (est)	\$990
2426	C00481184	FRIENDS OF ROSS BIELING	BIELING, ROSS PARKER	ROSS PARKER BIELING	\$385,138	0		Not Filed	\$128,379 (est)	\$4,950
2427	C00483289	HEALY FOR NY	HEALY, TIMOTHY J	JULIAN H. GINGOLD	\$241,704	0	2/25/2011	25	\$23,094	\$235
2428	C00465856	HENDRY FOR CONGRESS	HENDRY, EDDIE	JOHN NESMITH	\$137,863	0		Not Filed	\$22,977 (est)	\$550
2431	C00478057	JAMES MILANO FOR CONGRESS	MILANO, JAMES	PATRICIA A. FRIEDMAN	\$296,381	0	2/25/2011	25	\$3,385	\$150
2432	C00480642	JIM PICCILLO FOR CONGRESS	PICCILLO, JAMES JOHN	SANDI KEEBLE	\$296,266	0		Not Filed	\$32,918 (est)	\$990
2433	C00484303	JOHNSON FOR CONGRESS	JOHNSON, HARRY CLAUD	HARRY JOHNSON	\$121,900	0		Not Filed	\$60,950 (est)	\$2,970
2434	C00482893	JOYCE JOHNSON FOR CONGRESS 2010	JOHNSON, JOYCE STANLEY	MYRNA PHILLIPS OAKLEY	\$106,799	0		Not Filed	\$35,600 (est)	\$980
2438	C00469791	KUIPERS FOR CONGRESS	KUIPERS, WAYNE	TODD LAMBERS	\$464,446	0		Not Filed	\$92,889 (est)	\$3,850

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AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
2441	C00208322	MANAGEMENT AND TRAINING CORPORATION POLITICAL ACTION COMMITTEE		LYLE J. PARRY	\$132,878	0		Not Filed	\$18,983 (est)	\$550
2442	C00480038	MARVIN SCOTT FOR CONGRESS 2010	SCOTT, MARVIN B	FRANK L. MURPHY	\$457,008	0	3/8/2011	Not Filed	\$18,757	\$550
2444	C00475095	MATTHEW BURKE FOR CONGRESS	BURKE, MATTHEW	JENNIFER BURKE	\$100,517	0	3/18/2011	Not Filed	\$549	\$250
2445	C00432948	MCGOFF FOR CONGRESS	MCGOFF, JOHN P	MARJORIE O'LAUGHLIN	\$557,306	0		Not Filed	\$69,663 (est)	\$2,970
2446	C00462804	MIGUEL ORTIZ FOR CONGRESS	ORTIZ, MIGUEL ANTONIO	LUIS H. VERA	\$186,923	0	2/7/2011	7	\$31,662	\$340
2447	C00483925	MIKE THURMOND FOR US SENATE 2010	THURMOND, MICHAEL LAMAR	MATTHEW WARE	\$873,081	0	3/1/2011	29	\$11,032	\$255
2448	C00483388	MITCHELL FOR CONGRESS	MITCHELL, JOHN M	JOHN LINDLEY, III	\$107,165	0		Not Filed	\$35,722 (est)	\$990
2449	C00463406	MORGAN FOR CONGRESS	MORGAN, VINCENT SCOTT	HON. RD SNYDEN	\$157,457	1		Not Filed	\$31,491 (est)	\$1,237
2452	C00469817	PLUMMER FOR CONGRESS	PLUMMER, GLENN RODNEY	WILBERT SEARS	\$108,514	0		Not Filed	\$27,129 (est)	\$990
2456	C00474700	ROBBIE WILLS FOR CONGRESS	WILLS, ROBERT DALE JR	JERRY ADAMS	\$1,264,153	0		Not Filed	\$252,831 (est)	\$8,800
2457	C00462309	RUTH MCCLUNG FOR CONGRESS	MCCLUNG, RUTH CRAWFORD	ANNE LOFTFIELD	\$1,421,439	0	2/8/2011	8	\$12,453	\$150
2458	C00014092	SAN BERNARDINO COUNTY REPUBLICAN CENTRAL COMMITTEE-FEDERAL		KIRK LARSON	\$116,381	0	2/18/2011	18	\$344	\$115
2462	C00473603	STEVE CLARK FOR CONGRESS	CLARK, STEVE	RICK DIRKSE	\$1,236,249	1		Not Filed	\$309,062 (est)	\$11,000

AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
2464	C00475772	THE COMMITTEE TO ELECT DINO LAVERGHETTA	LAVERGHETTA, DINO	ROSE LAVERGHETTA	\$205,205	0		Not Filed	\$34,201 (est)	\$990
2465	C00475038	THOMAS C CASTELLANO CAMPAIGN FUND	CASTELLANO, THOMAS C	MARK A. GARCIA	\$102,513	0		Not Filed	\$20,503 (est)	\$550
2467	C00469304	TOM WIENS FOR US SENATE INC	WIENS, THOMAS J	FRANK SHAW	\$3,133,345	0		Not Filed	\$783,336 (est)	\$11,000
2468	C00335091	TRANSPORTATION INTERMEDIARIES ASSOCIATION'S TIAPAC		ROBERT A. VOLTSMANN	\$107,050	0	2/24/2011	24	\$4,300	\$145

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Reason To Believe Recommendation - 2010)
Year-End Report for the Administrative)
Fine Program:)

MIKE THURMOND FOR US SENATE) AF# 2447
2010, and MATTHEW WARE as treasurer;)
BOILERMAKERS LOCAL 85 FEDERAL) AF# 2400
POLITICAL ACTION COMMITTEE, and)
FRED E KEITH JR as treasurer;)
FRESNO COUNTY DEMOCRATIC) AF# 2424
WOMEN'S CLUB/DEMOCRATS IN)
ACTION, and HELEN WILSON as)
treasurer;)
BEN GRABER FOR CONGRESS, and) AF# 2399
BENJAMIN GRABER as treasurer;)
HEALY FOR NY, and JULIAN H) AF# 2427
GINGOLD as treasurer;)
JAMES MILANO FOR CONGRESS, and) AF# 2431
PATRICIA A FRIEDMAN as treasurer:)

TRANSPORTATION INTERMEDIARIES) AF# 2468
ASSOCIATION'S TIAPAC, and ROBERT)
A VOLTMANN as treasurer;)
DOUGHERTY SENATE CAMPAIGN) AF# 2418
COMMITTEE, and DR JODHA KHALSA)
as treasurer;)
SAN BERNARDINO COUNTY) AF# 2458
REPUBLICAN CENTRAL COMMITTEE-)
FEDERAL, and LARSON, KIRK as)
treasurer;)

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AMERICAN TELESERVICES) AF# 2397
ASSOCIATION PAC, and SEARCY, TIM)
MR. as treasurer;)
CIRO RODRIGUEZ FOR CONGRESS,) AF# 2404
and VERA, LUIS R. MR. as treasurer;)

RUTH MCCLUNG FOR CONGRESS, and) AF# 2457
ANNE LOFTFIELD as treasurer;)
BURRIS FOR SENATE, and RAYMOND) AF# 2401
DAVIS as treasurer;)
FERRE 2010, and ELIZABETH M) AF# 2422
TETREAULT as treasurer;)
MIGUEL ORTIZ FOR CONGRESS, and) AF# 2446
LUIS H VERA as treasurer;)

CHET D TRAYLOR FOR US SENATE) AF# 2403
CAMPAIGN, and LARRY W PICKETT as)
treasurer;)
CITIZENS FOR CHRIS GEISSLER, and) AF# 2405
MICHAEL JDRUDD as treasurer;)

STEVEN "BO" SMITH as treasurer;)
COMMITTEE TO ELECT DR GREG) AF# 2409
RABIDOUX, and KIMBERLEE E SMITH)
as treasurer;)

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DOUG TUDOR FOR CONGRESS, and) AF# 2417
DOUGLAS D. TUDOR as treasurer;)

ERIC WNUCK 2010, and ERIC WNUCK) AF# 2420
as treasurer;)

FRIENDS OF DAVID MADEIRA, and) AF# 2425
MICHAEL LACEY as treasurer;)
FRIENDS OF ROSS BIELING, and) AF# 2426
BIELING, ROSS PARKER as treasurer;)
HENDRY FOR CONGRESS, and JOHN) AF# 2428
NESMITH as treasurer;)
JIM PICCILLO FOR CONGRESS, and) AF# 2432
SANDI KEEBLE as treasurer;)
JOHNSON FOR CONGRESS, and) AF# 2433
HARRY JOHNSON as treasurer;)
JOYCE JOHNSON FOR CONGRESS) AF# 2434
2010, and MYRNA PHILLIPS OAKLEY)
as treasurer;)

KUIPERS FOR CONGRESS, and TODD) AF# 2438
LAMBERS as treasurer;)

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MANAGEMENT AND TRAINING) AF# 2441
CORPORATION POLITICAL ACTION)
COMMITTEE, and LYLE J PARRY as)
treasurer;)
MARVIN SCOTT FOR CONGRESS 2010,) AF# 2442
and FRANK L MUZZILLO as treasurer;)

MATTHEW BURKE FOR CONGRESS,) AF# 2444
and BURKE, JENNIFER as treasurer;)
MCGOFF FOR CONGRESS, and) AF# 2445
O'LAUGHLIN, MARJORIE as treasurer;)
MITCHELL FOR CONGRESS, and JOHN) AF# 2448
LINDLEY III as treasurer;)
MORGAN FOR CONGRESS, and) AF# 2449
SNYDEN, RD HON. as treasurer;)

PLUMMER FOR CONGRESS, and) AF# 2452
WILBERT SEARS as treasurer;)

ROBBIE WILLS FOR CONGRESS, and) AF# 2456
JERRY ADAMS as treasurer;)

STEVE CLARK FOR CONGRESS, and) AF# 2462
RICK DIRKSE as treasurer;)
THE COMMITTEE TO ELECT DINO) AF# 2464
LAVERGHETTA, and LAVERGHETTA,)
ROSE as treasurer;)

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THOMAS C CASTELLANO CAMPAIGN) AF# 2465
FUND, and MARK A GARCIA as)
treasurer;)

TOM WIENS FOR US SENATE INC, and) AF# 2467
FRANK SHAW as treasurer;)

CERTIFICATION

I, Shelley E. Garr, Deputy Secretary of the Federal Election Commission, do hereby certify that on April 01, 2011 the Commission took the following actions on the Reason To Believe Recommendation - 2010 Year-End Report for the Administrative Fine Program as recommended in the Reports Analysis Division's Memorandum dated March 30, 2011, on the following committees:

AF#2398 Decided by a vote of 6-0 to: (1) find reason to believe that ASSOCIATIONS INC. PAC/ASSOCIA PAC, and CUSHMAN, NANCY as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2447 Decided by a vote of 6-0 to: (1) find reason to believe that MIKE THURMOND FOR US SENATE 2010, and MATTHEW WARE as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

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AF#2400 Decided by a vote of 6-0 to: (1) find reason to believe that BOILERMAKERS LOCAL 85 FEDERAL POLITICAL ACTION COMMITTEE, and FRED E KEITH JR as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2424 Decided by a vote of 6-0 to: (1) find reason to believe that FRESNO COUNTY DEMOCRATIC WOMEN'S CLUB/DEMOCRATS IN ACTION, and HELEN WILSON as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2399 Decided by a vote of 6-0 to: (1) find reason to believe that BEN GRABER FOR CONGRESS, and BENJAMIN GRABER as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2427 Decided by a vote of 6-0 to: (1) find reason to believe that HEALY FOR NY, and JULIAN H GINGOLD as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2431 Decided by a vote of 6-0 to: (1) find reason to believe that JAMES MILANO FOR CONGRESS, and PATRICIA A FRIEDMAN as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2468 Decided by a vote of 6-0 to: (1) find reason to believe that TRANSPORTATION INTERMEDIARIES ASSOCIATION'S TIAPAC, and ROBERT A VOLTMANN as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report;

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(2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2418 Decided by a vote of 6-0 to: (1) find reason to believe that DOUGHERTY SENATE CAMPAIGN COMMITTEE, and DR JODHA.KHALSA as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2458 Decided by a vote of 6-0 to: (1) find reason to believe that SAN BERNARDINO COUNTY REPUBLICAN CENTRAL COMMITTEE-FEDERAL, and LARSON, KIRK as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2397 Decided by a vote of 6-0 to: (1) find reason to believe that AMERICAN TELESERVICES ASSOCIATION PAC, and SEARCY, TIM MR. as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2404 Decided by a vote of 6-0 to: (1) find reason to believe that CIRO RODRIGUEZ FOR CONGRESS, and VERA, LUIS R. MR. as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2457 Decided by a vote of 6-0 to: (1) find reason to believe that RUTH MCCLUNG FOR CONGRESS, and ANNE LOFTFIELD as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

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AF#2401 Decided by a vote of 6-0 to: (1) find reason to believe that BURRIS FOR SENATE, and RAYMOND DAVIS as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2422 Decided by a vote of 6-0 to: (1) find reason to believe that FERRE 2010, and ELIZABETH M TETREAULT as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2446 Decided by a vote of 6-0 to: (1) find reason to believe that MIGUEL ORTIZ FOR CONGRESS, and LUIS H VERA as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2403 Decided by a vote of 6-0 to: (1) find reason to believe that CHET D TRAYLOR FOR US SENATE CAMPAIGN, and LARRY W PICKETT as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2405 Decided by a vote of 6-0 to: (1) find reason to believe that CITIZENS FOR CHRIS GEISLER, and MICHAEL JORUDD as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

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AF#2409 Decided by a vote of 6-0 to: (1) find reason to believe that COMMITTEE TO ELECT DR GREG RABIDOUX, and KIMBERLEE E SMITH as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

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AF#2417 Decided by a vote of 6-0 to: (1) find reason to believe that DOUG TUDOR FOR CONGRESS, and DOUGLAS D. TUDOR as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2420 Decided by a vote of 6-0 to: (1) find reason to believe that ERIC WNUCK 2010, and ERIC WNUCK as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

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AF#2425 Decided by a vote of 6-0 to: (1) find reason to believe that FRIENDS OF DAVID MADEIRA, and MICHAEL LACEY as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2426 Decided by a vote of 6-0 to: (1) find reason to believe that FRIENDS OF ROSS BIELING, and BIELING, ROSS PARKER as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2428 Decided by a vote of 6-0 to: (1) find reason to believe that HENDRY FOR CONGRESS, and JOHN NESMITH as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2432 Decided by a vote of 6-0 to: (1) find reason to believe that JIM PICCILLO FOR CONGRESS, and SANDI KEEBLE as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2433 Decided by a vote of 6-0 to: (1) find reason to believe that JOHNSON FOR CONGRESS, and HARRY JOHNSON as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2434 Decided by a vote of 6-0 to: (1) find reason to believe that JOYCE JOHNSON FOR CONGRESS 2010, and MYRNA PHILLIPS OAKLEY as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

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AF#2438 Decided by a vote of 6-0 to: (1) find reason to believe that KUIPERS FOR CONGRESS, and TODD LAMBERS as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2441 Decided by a vote of 6-0 to: (1) find reason to believe that MANAGEMENT AND TRAINING CORPORATION POLITICAL ACTION COMMITTEE, and LYLE J PARRY as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2442 Decided by a vote of 6-0 to: (1) find reason to believe that MARVIN SCOTT FOR CONGRESS 2010, and FRANK L MUZZILLO as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2444 Decided by a vote of 6-0 to: (1) find reason to believe that MATTHEW BURKE FOR CONGRESS, and BURKE, JENNIFER as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2445 Decided by a vote of 6-0 to: (1) find reason to believe that MCGOFF FOR CONGRESS, and O'LAUGHLIN, MARJORIE as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2448 Decided by a vote of 6-0 to: (1) find reason to believe that MITCHELL FOR CONGRESS, and JOHN LINDLEY III as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2449 Decided by a vote of 6-0 to: (1) find reason to believe that MORGAN FOR CONGRESS, and SNYDEN, RD HON. as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

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AF#2452 Decided by a vote of 6-0 to: (1) find reason to believe that PLUMMER FOR CONGRESS, and WILBERT SEARS as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2456 Decided by a vote of 6-0 to: (1) find reason to believe that ROBBIE WILLS FOR CONGRESS, and JERRY ADAMS as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2462 Decided by a vote of 6-0 to: (1) find reason to believe that STEVE CLARK FOR CONGRESS, and RICK DIRKSE as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2464 Decided by a vote of 6-0 to: (1) find reason to believe that THE COMMITTEE TO ELECT DINO LAVERGHETTA, and LAVERGHETTA, ROSE as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2465 Decided by a vote of 6-0 to: (1) find reason to believe that THOMAS C CASTELLANO CAMPAIGN FUND, and MARK A GARCIA as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2467 Decided by a vote of 6-0 to: (1) find reason to believe that TOM WIENS FOR US SENATE INC, and FRANK SHAW as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

11092670720

Federal Election Commission
Certification for Administrative Fines
April 01, 2011

Page 16

Attest:

April 4, 2011
Date

Shelley E. Garr
Shelley E. Garr
Deputy Secretary

11092670721



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 4, 2011

Jerry Adams, in official capacity as Treasurer
Robbie Wills for Congress
P.O. Box 3742
Little Rock, AR 72203

C00474700
AF#: 2456

Dear Mr. Adams:

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that your committee file a Year End Report of Receipts and Disbursements every calendar year. This report, covering the period through December 31, 2010, was due no later than January 31, 2011. 2 U.S.C. § 434(a). Records at the Federal Election Commission ("FEC") indicate that this report was not filed within thirty (30) days of the due date. You should file this report if you have not already done so.

The Act permits the FEC to impose civil money penalties for violations of the reporting requirements of 2 U.S.C. § 434(a). 2 U.S.C. § 437g(a)(4). On April 1, 2011, the FEC found that there is reason to believe ("RTB") that Robbie Wills for Congress and you, in your official capacity as treasurer, violated 2 U.S.C. § 434(a) by failing to file timely this report on or before January 31, 2011. Based on the FEC's schedules of civil money penalties at 11 C.F.R. § 111.43, the amount of your civil money penalty calculated at the RTB stage is \$8,800. Please see the attached copy of the Commission's administrative fine regulations at 11 C.F.R. §§ 111.30-11.46. Attachment 1. The Commission's website contains further information about how the administrative fine program works and how the fines are calculated. See <http://www.fec.gov/af/af.shtml>. 11 C.F.R. § 111.34. Your payment of \$8,800 is due within forty (40) days of the finding, or by May 11, 2011, and is based on these factors:

Sensitivity of Report: Not Election Sensitive
Level of Activity: \$252,831
Number of Days Late: Not Filed
Number of Previous Civil Money Penalties Assessed: 0

At this juncture, the following courses of action are available to you:

1. If You Choose to Challenge the RTB Finding and/or Civil Money Penalty

If you should decide to challenge the RTB finding and/or calculated civil money penalty, you must submit a written response, including the AF# found at the top of page 1 under your committee's identification number, to the FEC's Office of Administrative Review, 999 E Street,

NW, Washington, DC 20463. Your response must be received within forty (40) days of the Commission's RTB finding, or May 11, 2011. 11 C.F.R. § 111.35(a). Your written response must include the reason(s) why you are challenging the RTB finding and/or calculated civil money penalty, and must include the factual basis supporting the reason(s) and supporting documentation. The FEC strongly encourages that documents be submitted in the form of affidavits or declarations. 11 C.F.R. § 111.36(c).

The FEC will only consider challenges that are based on at least one of three grounds: (1) a factual error in the RTB finding; (2) miscalculation of the calculated civil money penalty by the FEC; or (3) your demonstrated use of best efforts to file in a timely manner when prevented from doing so by reasonably unforeseen circumstances that were beyond your control. 11 C.F.R. § 111.35(b). In order for a challenge to be considered on the basis of best efforts, you must have filed the required report no later than 24 hours after the end of these reasonably unforeseen circumstances. *Id.* Examples of circumstances that will be considered reasonably unforeseen and beyond your control include, but are not limited to, (1) a failure of Commission computers or Commission-provided software despite your seeking technical assistance from Commission personnel and resources; (2) a widespread disruption of information transmissions over the Internet that is not caused by a failure of the Commission's or your computer systems or Internet service provider; and (3) severe weather or other disaster-related incident. 11 C.F.R. § 111.35(c). Examples of circumstances that will not be considered reasonably unforeseen and beyond your control include, but are not limited to, (1) negligence; (2) delays caused by vendors or contractors; (3) treasurer and staff illness, inexperience or unavailability; (4) committee computer, software, or Internet service provider failures; (5) failure to know filing dates; and (6) failure to use filing software properly. 11 C.F.R. § 111.35(d).

The "failure to raise an argument in a timely fashion during the administrative process shall be deemed a waiver" of your right to present such argument in a petition to the U.S. district court under 2 U.S.C. § 437g. 11 C.F.R. § 111.38.

If you intend to be represented by counsel, please advise the Office of Administrative Review. You should provide, in writing, the name, address and telephone number of your counsel and authorize counsel to receive notifications and communications relating to this challenge and imposition of the calculated civil money penalty.

2. If You Choose Not to Pay the Civil Money Penalty and Not to Submit a Challenge

If you do not pay the calculated civil money penalty and do not submit a written response, the FEC will assume that the preceding factual allegations are true and make a final determination that Robbie Wills for Congress and you, in your official capacity as treasurer, violated 2 U.S.C. § 434(a) and assess a civil money penalty.

Unpaid civil money penalties assessed through the Administrative Fine regulations will be subject to the Debt Collection Act of 1982 ("DCA"), as amended by the Debt Collection Improvement Act of 1996, 31 U.S.C. § 3701 *et seq.* The FEC may take any and all appropriate action authorized and required by the DCA, as amended, including transfer to the U.S. Department of the Treasury for collection. 11 C.F.R. § 111.51(a)(2).

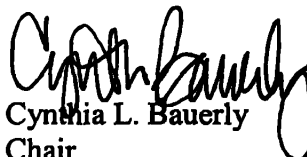
3. If You Choose to Pay the Civil Money Penalty

If you should decide to pay the calculated civil money penalty, send the enclosed remittance form, along with your payment, to the FEC at the address on page 4. Upon receipt of your payment, the FEC will send you a final determination letter.

This matter was generated based on information ascertained by the FEC in the normal course of carrying out its supervisory responsibilities. 2 U.S.C. § 437g(a)(2). It will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and 437g(a)(12)(A) until it is placed on the public record in accordance with 11 C.F.R. § 111.42, unless you notify the FEC in writing that you wish the matter to be made public.

As noted earlier, you may obtain additional information on the FEC's administrative fine program, including the final regulations, on the FEC's website at <http://www.fec.gov/af/af.shtml>. If you have questions regarding the payment of the calculated civil money penalty, please contact Sari Pickerall in the Reports Analysis Division at our toll free number (800) 424-9530 (at the prompt press 5) or (202) 694-1130. If you have questions regarding the submission of a challenge, please contact the Office of Administrative Review at our toll free number (800) 424-9530 (press 0, then ext. 1660) or (202) 694-1660.

On behalf of the Commission,


Cynthia L. Bauerly
Chair

ADMINISTRATIVE FINE REMITTANCE & PAYMENT INSTRUCTIONS

In accordance with the schedule of penalties at 11 C.F.R. § 111.43, the amount of your civil money penalty calculated at RTB is \$8,800 for the 2010 Year-End Report.

Please mail this remittance with a check or money order made payable to the Federal Election Commission to the following address:

Federal Election Commission
P.O. Box 979058
St. Louis, MO 63197-9000

If you choose to send your remittance and payment by courier or overnight delivery, please use this address:

U.S. Bank - Government Lockbox
FEC #979058
1005 Convention Plaza
Attn: Government Lockbox, SL-MO-C2GL
St. Louis, MO 63101

The remittance and your payment are due by May 11, 2011. Upon receipt of your remittance and payment, the FEC will send you a final determination letter.

PAYMENTS BY PERSONAL CHECK

Personal checks will be converted into electronic funds transfers (EFTS). Your account will be electronically debited for the amount on your check, usually within 24 hours, and the debit will appear on your regular statement. We will destroy your original check and keep a copy of it. In case the EFT cannot be processed for technical reasons, you authorize us to process the copy in lieu of the original check. Should the EFT not be completed because of insufficient funds, we may try to make the transfer twice.

PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT

FOR: Robbie Wills for Congress

FEC ID#: C00474700

AF#: 2456

PAYMENT DUE DATE: May 11, 2011

PAYMENT AMOUNT DUE: \$8,800

11092670725

FEC OFFICE OF
ADMIN REVIEW

WILLS LAW FIRM, PLLC

LEGAL SERVICES • GOVERNMENT AFFAIRS



ROBBIE WILLS
Attorney at Law

1510 Mill Street
P.O. Box 306
Conway, AR 72034
www.robbielwills.com

ph (501) 329-3179
fax (501) 329-0321
cell (501) 730-4677
rwills@cyberback.com

May 9, 2011

FEC Office of Administrative Review
999 E Street NW
Washington, DC 20463

RE: C00474700, AF#: 2456

Dear Sirs:

Reference is made to your letter of April 4, 2011 concerning AF#: 2456. This letter serves as notice that I am challenging the RTB Finding and Civil Money Penalty.

The reasons for this challenge are as follows:

- (1) Incorrect estimate of amount of committee activity.
- (2) Miscalculation of civil money penalty by the FEC.

Please find the enclosed affidavit supporting these facts as well as the report in question. Please forward all correspondence to me at the address above. Thank you.

Sincerely,

Robbie Wills

11092670726



FEC FORM 3

REPORT OF RECEIPTS AND DISBURSEMENTS

For An Authorized Committee

FILING FEC-726411

1. ROBBIE WILLS FOR CONGRESS

PO BOX 3742
LITTLE ROCK, Arkansas 72203

State is Arkansas in District: 2

2. FEC Committee ID #: C00474700

3. This report is NOT an AMENDMENT

4. Report Type = YEAR-END

Filed 04/25/2011

SUMMARY PAGE

DETAILED SUMMARY PAGE

Schedule A Filings (ITEMIZED RECEIPTS)

Schedule B Filings (ITEMIZED DISBURSEMENTS)

Schedule C Filings (LOAN INFORMATION)

(End FEC FORM 3)

SUMMARY PAGE

11092670727

Of Receipts And Disbursements

5. Covering Period 10/01/2010 Through 12/31/2010

	Column A This Period	Column B Election Cycle-To-Date
6. Net Contributions (other than loans)		
(a) Total Contributions (other than loans)	1450.00	0.00
(b) Total Contribution Refunds	0.00	0.00
(c) Net Contributions (6(a) - 6(b))	1450.00	0.00
7. Net Operating Expenditures		
(a) Total Operating Expenditures	4064.46	0.00
(b) Total Offsets to Operating Expenditures	0.00	0.00
(c) Net Operating Expenditures	4064.46	0.00
8. Cash on Hand at Close of Reporting Period	1233.61	
9. Debts and Obligations Owed TO the Committee	0.00	
Itemize all on SCHEDULE C or SCHEDULE D		
10. Debts and Obligations Owed BY the Committee	33021.74	
Itemize all on SCHEDULE C or SCHEDULE D		

Treasurer: Jerry Adams
 Date Signed: 04/25/2011

(End Summary Page, FEC FORM 3)**DETAILED SUMMARY PAGE****Of Receipts And Disbursements**

	Column A This Period	Column B Election Cycle-To- Date	Column C Post- Election
I. RECEIPTS			
11. Contributions (other than loans) From:			
(a) Individuals/Persons Other than Political Committees			
(i) Itemized	1000.00		
(ii) Unitemized	450.00		
(iii) Total Of Contributions From Individuals	1450.00	0.00	0.00
(b) Political Party Committees	0.00	0.00	0.00
(c) Other Political Committees (such as PACS)	0.00	0.00	0.00

(d) The Candidate	0.00	0.00	0.00
(e) Total Contributions (11(a)(iii) + (b) + (c))	1450.00	0.00	0.00
12. Transfers From Other Authorized Committees	0.00	0.00	0.00
13. Loans			
(a) Made Or Guaranteed By The Candidate	3771.74	0.00	2254.38
(b) All Other Loans	0.00	0.00	0.00
(c) Total Loans ((a) + (b))	3771.74	0.00	2254.38
14. Offsets to Operating Expenditures (Refunds, Rebates, etc)	0.00	0.00	0.00
15. Other Receipts	0.00	0.00	0.00
16. Total Receipts (11(e) + 12 + 13(c) + 14 + 15)	5221.74	0.00	2254.38
II. DISBURSEMENTS			
17. Operating Expenditures	4064.46	0.00	2546.83
18. Transfers to Other Authorized Committees	0.00	0.00	0.00
19. Loan Repayments:			
(a) Of Loans Made or Guaranteed by the Candidate	1750.00	0.00	1750.00
(b) Of All Other Loans	0.00	0.00	0.00
(c) Total Loan Repayments ((a) + (b))	1750.00	0.00	1750.00
20. Refunds of Contributions To:			
(a) Individuals/Persons Other Than Political Committees	0.00	0.00	0.00
(b) Political Party Committees	0.00	0.00	0.00
(c) Other Political Committees (such as PACs)	0.00	0.00	0.00
(d) Total Contribution Refunds (28(a) + (b) + (c))	0.00	0.00	0.00
21. Other Disbursements	0.00	0.00	0.00
22. Total Disbursements (17 + 18 + 19(c) + 20(d) + 21)	5814.46	0.00	4296.83
III. CASH SUMMARY			
23. Cash On Hand At Beginning Of Reporting Period	1826.33		
24. Total Receipts This Period (line 16)	5221.74	0.00	0.00
25. Subtotal (23 + 24)	7048.07		
26. Total Disbursements This Period (line 22)	5814.46	0.00	2546.83
27. Cash On Hand At Close Of The Reporting Period (25 - 26)	1233.61		

(End Detailed Summary Page, FEC FORM 3)



Generated Mon May 9 10:07:08 2011 .

11092670730



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Via First Class Mail

May 10, 2011

Jerry Adams, in official capacity as Treasurer
Robbie Wills for Congress
P.O. Box 3742
Little Rock, AR 72203

C00474700
AF# 2456-

Dear Mr. Adams:

On May 10, 2011, the Commission's Office of Administrative Review ("OAR") received your written response ("challenge") which is being reviewed by OAR. If you have any questions regarding your challenge, please contact this Office on our toll free number (800)424-9530 (press 0, then ext. 1660) or (202)694-1660.

Sincerely,

A handwritten signature in black ink, appearing to read "Dayna C. Brown".

Dayna C. Brown
Reviewing Officer
Office of Administrative Review

11092670731

2011 MAY 12 A 7 20

Date: May 10, 2011

**REFERRAL TO OFFICE OF ADMINISTRATIVE REVIEW
CHALLENGE RECEIVED**

AF#: 2456

Committee Name: Robbie Wills for Congress

Committee ID#: C00474700

Committee Address (if different than in RTB letter):

Treasurer Name (if different than in RTB finding): N

Attachments:

**Copy of RTB Circulation Report, dated March 30, 2011 and RTB Certification,
dated April 4, 2011 (Y/N): N**

Attachment #: N/A

Proof of Delivery (to be forwarded at later date if not yet received) (Y/N): Y

Attachment #: 1

Other Relevant Telecoms (Y/N): N

Attachment #: N/A

Original Correspondence Received by RAD in Response to RTB Letter (Y/N): N

Attachment #: N/A

RAD Staff Declaration (Y/N): Y

-2010 Year End Report Prior Notice, dated December 27, 2010.

-Non-Filer Letter, dated February 16, 2011.

-RTB Letter, dated April 4, 2011.

Attachment #: 3

Other RAD Information: (Y/N): Y

Attachment#: 4

11092670732



Delivery Notification

Dear Customer,

This notice serves as proof of delivery for the shipment listed below.

Tracking Number: 1Z WF5 860 AZ 9663 897 3
Reference Number(s): RAD, 2456
Service: NEXT DAY AIR
Special Instructions: ADULT SIGNATURE REQUIRED
Shipped/Billed On: 04/08/2011
Delivered On: 04/13/2011 9:07 A.M.
Delivered To:
CONWAY, AR, US 72034
Signed By: ADAMS
Location: RESIDENTIAL

Thank you for giving us this opportunity to serve you.

Sincerely,
UPS

Tracking results provided by UPS: 04/13/2011 12:33 P.M. ET

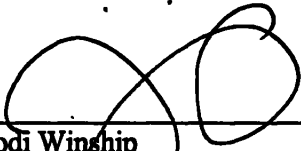
Attachment 1

11092670733

DECLARATION OF JODI WINSHIP

1. I am the Chief of the Compliance Branch for the Reports Analysis Division of the Federal Election Commission ("Commission"). In my capacity as Chief of the Compliance Branch, I oversee the initial processing of the Administrative Fine Program. I make this declaration based on my personal knowledge and, if called upon as a witness, could and would testify competently to the following matters.
2. I hereby certify that documents identified herein are true and accurate copies of the following sent by the Commission to Robbie Wills for Congress:
 - A) On December 27, 2010, Prior Notice referencing the 2010 Year End Report was sent to Congressional Candidates, Parties and PACs registered with the FEC. The Prior Notice was also available on the FEC web site beginning on that date. Since Robbie Wills for Congress did not provide a current email address to the FEC on their Statement of Organization (FEC Form 1), they did not receive an electronic copy of the Prior Notice via email on December 27, 2010;
 - B) Non-Filer Letter, dated February 16, 2011, referencing the 2010 Year End Report;
 - C) Reason-to-Believe Letter, dated April 4, 2011, referencing the 2010 Year End Report.
3. I hereby certify that I have searched the Commission's public records and find that Robbie Wills filed the 2010 Year End Report with the Commission on April 25, 2011.

4. Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury that the foregoing is true and correct and that all relevant telecoms for the matter have been provided. This declaration was executed at Washington, D.C. on the 10th day of May, 2011.



Jodi Winship
Chief, Compliance Branch
Reports Analysis Division
Federal Election Commission

11092670735



YEAR-END

REPORT NOTICE

FEDERAL ELECTION COMMISSION

CONGRESSIONAL COMMITTEES

December 27, 2010

CURRENT REPORT DUE

I. 2010 GENERAL ELECTION CANDIDATES

REPORT	REPORTING PERIOD ¹	REGISTRATION DEADLINE	FINANCIAL DEADLINE
Year-End	11/23/10 - 12/31/10	01/31/11	01/31/11

II. UNSUCCESSFUL 2010 PRIMARY ELECTION CAMPAIGN COMMITTEES AND CANDIDATES NOT ACTIVE IN 2010 ELECTIONS

REPORT	REPORTING PERIOD ¹	REGISTRATION DEADLINE	FINANCIAL DEADLINE
Year-End	10/01/10 - 12/31/10	01/31/11	01/31/11

NOTE FOR COMMITTEES NOT REQUIRED TO FILE A POST-GENERAL ELECTION REPORT CHART II (see above)

For candidates who ran in 2010 but did not participate in the general election, the reporting period for the Year-End Report spans two election cycles. For this report only, committees should instead use the Post-Election Detailed Summary Page (FEC Form 3, Pages 5-8). Committees should not use the normal Detailed Summary Page.

[Click here for Supplemental Filing Information](#)

[See Page 2 for 2011 Reporting Schedule](#)

¹A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered up through the close of books for the first report due.

REPORTING SCHEDULE FOR 2011

REPORT	CLOSE OF BOOKS ¹	REG. CERT. & OVERNIGHT MAILING DEADLINE	FILING DEADLINE
April Quarterly	03/31/11	04/15/11	04/15/11
July Quarterly	06/30/11	07/15/11	07/15/11
October Quarterly	09/30/11	10/15/11	10/15/11 ²
Year-End	12/31/11	01/31/12	01/31/12

[Click here for Supplemental Filing Information](#)

¹A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered up through the close of books for the first report due.

²Notice that this filing deadline falls on a weekend. Filing deadlines are not extended when they fall on nonworking days. Accordingly, reports filed by methods other than Registered, Certified or Overnight Mail, or electronically, must be received before the Commission's close of business on the last business day before the deadline.

2010 SUPPLEMENTAL FILING INFORMATION CONGRESSIONAL COMMITTEES

PLEASE NOTE: The Commission provides reminders of upcoming filing dates as a courtesy to help committees comply with the filing deadlines set forth in the Act and Commission regulations. Committee treasurers must comply with all applicable filing deadlines established by law, and the lack of prior notice does not constitute an excuse for failing to comply with any filing deadline.

WHO MUST FILE

Principal campaign committees of congressional candidates ¹ (including unopposed candidates and candidates whose names do not appear on the ballot) must file a Year-End Report on January 31, 2011. ²

Campaigns that raise or spend more than \$5,000 for the 2010 election cycle (and thus trigger registration and reporting requirements) must file quarterly reports throughout 2010, even if the candidate plans to retire, withdraws from the race prior to the primary election, loses the primary or drops out of the race prior to the general election. See 11 CFR 104.5(a)(2).

Before a committee can stop filing with the FEC, it must file a termination report with the Commission. See 11 CFR 102.3. Committees must continue to file reports until the Commission notifies them in writing that their termination report has been accepted.

METHODS OF FILING REPORTS

Electronic Filing

Reports filed electronically must be received and validated by the Commission by 11:59 p.m. Eastern Time on the filing deadline. See 11 CFR 104.5(e).

- Web Page: Electronic Filing Page
- Campaign Guide for Congressional Candidates and Committees (Candidate Guide), pp. 82-84 [PDF]

Paper Filing - Meeting the Filing Deadline

Paper Report filing options -- Registered, Certified or Overnight or First Class Mail. See 11 CFR 104.5(e).

- Web Page: Link to Paper Forms (for downloading and printing)
- Candidate Guide, p. 81 [PDF]

¹ Generally, an individual becomes a candidate for federal office (and thus triggers registration and reporting obligations) when his or her campaign exceeds \$5,000 in either contributions or expenditures. If the campaign has not crossed the \$5,000 threshold, it is not required to file reports. See 11 CFR 100.3(a).

² If a candidate has more than one authorized committee, the principal campaign committee must also file a consolidated report on Form 3Z [PDF].

11092670738

COMPLIANCE

Treasurer Responsibility

Committee Treasurers are responsible for both the timeliness and the accuracy of all reports. They may be subject to monetary penalties if reports are inaccurate or are not filed on time.

See 11 CFR 104.14(d).

- Statement of Policy Regarding Treasurers Subject to Enforcement Proceedings [PDF]
- Candidate Guide, p. 7 [PDF]

Administrative Fine Program

Political committees and their treasurers who fail to file their reports on time may be subject to civil money penalties up to \$17,600 (or more for repeat late- and non-filers).³

See 11 CFR 111.30.

- Web Page: Administrative Fine Program
- Candidate Guide, pp. 81-82 [PDF]

DISCLOSURE OF LOBBYIST BUNDLING ACTIVITY

Campaign committees must file FEC Form 3L [PDF] if they receive two or more bundled contributions from lobbyists/registrants or lobbyist/registrant PACs that aggregate in excess of \$16,000 during the applicable reporting period (see page 1 of this notice).

See 11 CFR 104.22 and 110.17(e).

- The Record: March 2009 issue [PDF]

2010 REPORTING SCHEDULE

- Web Page: 2010 Reporting Dates Page
- The Record: January 2010 issue [PDF]
- Candidate Guide, p. 79 [PDF]

IMPORTANT FILING INFORMATION - PAPER FILERS

In response to the 2001 anthrax threat, the U.S. Postal Service is irradiating mail directed to many federal agencies, including the FEC and the Secretary of the Senate.⁴ This process has not only delayed mail delivery, it has also damaged and in some cases destroyed pieces of mail. As a result, committees that file reports with the FEC may want to consider submitting their reports by some means other than U.S. mail. Alternative methods include electronic filing, overnight mail or delivery service, and hand delivery.

³ Penalties for late- or non-filing of 48-hour notices are based on the amount of contributions not timely disclosed. As a result, these penalties may exceed \$17,600, even for first-time violations.

⁴ Senate committees should contact the Secretary of the Senate at (202) 224-0322 for more information on filing reports via US mail.

FOR INFORMATION, CALL: (800) 424-9530 or (202) 694-1100



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

February 16, 2011

RQ-7

JERRY ADAMS, TREASURER
ROBBIE WILLS FOR CONGRESS
PO BOX 3742
LITTLE ROCK, AR 72203

IDENTIFICATION NUMBER: C00474700

REFERENCE: YEAR-END REPORT 10/1/2010 - 12/31/2010

DEAR TREASURER:

IT HAS COME TO THE ATTENTION OF THE FEDERAL ELECTION COMMISSION THAT YOU MAY HAVE FAILED TO FILE THE ABOVE REFERENCED REPORT OF RECEIPTS AND EXPENDITURES AS REQUIRED BY THE FEDERAL ELECTION CAMPAIGN ACT, AS AMENDED.

IT IS IMPORTANT THAT YOU FILE THIS REPORT IMMEDIATELY WITH THE FEDERAL ELECTION COMMISSION, 999 E STREET, N.W., WASHINGTON, D.C. 20463 FOR HOUSE CANDIDATES, OR THE SECRETARY OF THE SENATE, 232 HART SENATE OFFICE BUILDING, WASHINGTON, D.C. 20510 (MAILING ADDRESS: OFFICE OF PUBLIC RECORDS, P.O. BOX 2517, ALEXANDRIA, VA 22301), FOR SENATE CANDIDATES. PLEASE NOTE THAT ELECTRONIC FILERS MUST SUBMIT THEIR REPORTS ELECTRONICALLY, AS PER 11 CFR §104.18. A COPY OF THE REPORT MUST ALSO BE FILED WITH THE SECRETARY OF STATE OR EQUIVALENT STATE OFFICER UNLESS THE STATE IS EXEMPT FROM THE FEDERAL REQUIREMENT TO RECEIVE AND MAINTAIN PAPER COPIES. YOU CAN VERIFY THE COMMISSION'S RECEIPT OF ANY DOCUMENTS SUBMITTED BY YOUR COMMITTEE ON THE FEC WEBSITE AT WWW.FEC.GOV.

THE FAILURE TO TIMELY FILE THIS REPORT MAY RESULT IN CIVIL MONEY PENALTIES, AN AUDIT OR LEGAL ENFORCEMENT ACTION. THE CIVIL MONEY PENALTY CALCULATION FOR LATE REPORTS DOES NOT INCLUDE A GRACE PERIOD AND BEGINS ON THE DAY FOLLOWING THE DUE DATE FOR THE REPORT. DUE TO HEIGHTENED SECURITY SCREENING MEASURES, DELIVERY OF MAIL BY THE US POSTAL SERVICE MAY BE DELAYED. THE COMMISSION RECOMMENDS THAT YOU SUBMIT YOUR REPORT VIA OVERNIGHT DELIVERY OR COURIER SERVICE.

IF YOU HAVE ANY QUESTIONS REGARDING THIS MATTER, PLEASE CONTACT SARI PICKERALL AT OUR TOLL FREE NUMBER (800)424-9530. OUR DIRECT LOCAL NUMBER IS (202)394-1130.

SINCERELY,

Debbie Chacena

DEBBIE CHACENA
ASSISTANT STAFF DIRECTOR
REPORTS ANALYSIS DIVISION (RAD)

11092670740
11030574192



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

11
31
SECRET

2011 JUN 29 P 4:14

SENSITIVE

June 29, 2011

MEMORANDUM

To: The Commission

Through: Alec Palmer *AP*
Acting Staff Director

From: Patricia Carmona *PC*
Chief Compliance Officer

Dayna C. Brown *DCB*
Reviewing Officer
Office of Administrative Review

Subject: Reviewing Officer Recommendation in AF# 2456 – Robbie Wills for Congress and Jerry Adams in his official capacity as Treasurer (C00474700)

The attached Reviewing Officer Recommendation is being circulated on an informational basis. A copy was also sent to the respondents in accordance with 11 C.F.R. § 111.36(f). The respondents may file with the Commission Secretary a written response within 10 days of transmittal of the recommendation.

After the 10 day period, the Reviewing Officer Recommendation and the respondents' written response, if any, will be circulated to the Commission to make a final determination.

Attachment

11092670741



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 29, 2011

**REVIEWING OFFICER RECOMMENDATION
OFFICE OF ADMINISTRATIVE REVIEW ("OAR")**

AF# 2456 – Robbie Wills for Congress and Jerry Adams, in his official capacity as Treasurer
(C00474700)

Summary of Recommendation

Make a final determination that the respondents violated 2 U.S.C. § 434(a) and assess a \$550 civil money penalty.

Reason-to-Believe Background

On April 1, 2011, the Commission found reason to believe ("RTB") that the respondents violated 2 U.S.C. § 434(a) for failing to file the 2010 Year End Report and made a preliminary determination that the civil money penalty was \$8,800 based on the schedule of penalties at 11 C.F.R. § 111.43. A letter, dated April 4, 2011, was mailed to the respondents' address of record from the Reports Analysis Division ("RAD") to notify them of the Commission's RTB finding and civil money penalty. The letter was returned stating that the addressee was unknown, therefore on April 7 a copy of the letter was sent to an alternate address. The letter was later returned indicating that the receiver had moved. The letter was mailed a third time on April 8 to an alternate address, and successfully delivered on April 13.

Legal Requirements

The Federal Election Campaign Act ("Act") states that the treasurer of a principal campaign committee of a candidate shall file a report for the period ending December 31 no later than January 31. 2 U.S.C. § 434(a)(2)(A)(iii) and 11 C.F.R. § 104.5(a)(1)(i). Reports electronically filed must be received and validated at or before 11:59 p.m., Eastern Standard/Daylight Time on the prescribed filing date to be timely filed. 11 C.F.R. §§ 100.19(c) and 104.5(e). The treasurer shall be personally responsible for the timely filing of reports. 11 C.F.R. § 104.14(d).

Respondents' Challenge

On May 10, 2011, the Commission received the written response ("challenge") from the Candidate, Robbie Wills. In his notarized affidavit he states that the Commission's RTB finding incorrectly estimated the Committee's activity to be \$252,831. He states that the campaign had total receipts of \$5,221.74 and total disbursements of \$5,814.46 for the relevant period and asks for a recalculation of the civil money penalty so he can pay the fine and bring the matter to a close. The Candidate states that the Treasurer has resigned and that he will personally assume all responsibility for compliance with the Commission.

Included with the challenge is a copy of FEC Disclosure Form 3 for the Year End Report (Filing FEC-726411) and a copy of the RTB letter.

11092670742

Analysis

Given the Candidate's indication that the Treasurer has resigned, the Reviewing Officer called the Candidate on May 10, 2011 and informed him that an Amended Statement of Organization was required to disclose a new Treasurer, pursuant to 11 C.F.R. § 102.2(a)(2). The Reviewing Officer further advised that if a new Treasurer was not named, the former Treasurer would continue to be the Treasurer of record for the Committee and correspondence regarding this case would continue to be sent to him in his official capacity as Treasurer. The Candidate was provided the name and number of the Committee's Reports Analyst for assistance in filing the amendment. To date an Amended Statement of Organization has not been received and Jerry Adams continues to be the Treasurer of record for the Committee.

At the time of the RTB finding for the Year End Report, the Commission had not received the respondents' report; therefore, an estimated level of activity (\$252,831) was used to calculate the RTB civil money penalty. 11 C.F.R. § 111.43(d)(2)(i). The respondents electronically filed the 2010 Year End Report on April 25, 2011. It discloses total receipts of \$5,221.74 and total disbursements of \$5,814.46, resulting in an actual level of activity of \$11,036.20. Using the schedule of penalties at 11 C.F.R. § 111.43(a) for a non-election sensitive report considered not filed for the purposes of the civil money penalty calculation (11 C.F.R. § 111.43(d)(4)(e)(1)), respondents with no prior violation, and the level of activity bracket of \$10,000 - \$24,999.99, the civil money penalty is $\$550 \times [1 + (.25 \times 0)]$ or \$550.

Their challenge fails to address any of the three valid grounds at 11 C.F.R. § 111.35(b). These are: (i) the RTB finding is based on factual errors; and/or (ii) the improper calculation of the civil money penalty; and/or (iii) they used best efforts to file on time but were prevented from doing so by reasonably unforeseen circumstances that were beyond their control and they filed the report no later than 24 hours after the end of these circumstances. Therefore, the Reviewing Officer recommends that the Commission make a final determination that the respondents violated 2 U.S.C. § 434(a) and assess a civil money penalty of \$550.

OAR Recommendations

- (1) Adopt the Reviewing Officer recommendation for AF# 2456 involving Robbie Wills for Congress and Jerry Adams, in his official capacity as Treasurer, in making the final determination;
- (2) Make a final determination in AF# 2456 that Robbie Wills for Congress and Jerry Adams and, in his official capacity as Treasurer violated 2 U.S.C. § 434(a) and, based on the actual level of activity disclosed on the Year End Report (\$11,036.20), assess a civil money penalty of \$550 (reduced from the RTB civil money penalty of \$8,800); and
- (3) Send the appropriate letter.

Reviewing Officer: Dayna C. Brown

Attachments

Attachment 1 – Challenge Received from Respondents

Attachment 2 – Declaration from RAD,

Attachment 3 – Declaration from OAR

DECLARATION OF DAYNA C. BROWN

1. I am the Reviewing Officer in the Office of Administrative Review for the Federal Election Commission ("Commission"). In my capacity as Reviewing Officer, I conduct research with respect to all challenges submitted in accordance with the Administrative Fine program.
2. The 2010 Year End Report is due January 31, 2011. If electronically filed, it must be received and validated by the Commission at or before 11:59 p.m., Eastern Standard/Daylight Time on January 31 to be timely filed.
3. I hereby certify that I have searched the Commission's public records and that the documents identified herein are true and accurate copies of:
 - a. Pages 1 and 3 of the Amended Statement of Organization filed by Robbie Wills for Congress and Jerry Adams, in his official capacity as Treasurer. According to the Commission's records the Statement was dated April 5, 2010, received on April 21, 2010, and did not disclose an email address. Line 8 lists Jerry Adams as Treasurer;
 - b. Page 1 of the Summary Page and Pages 3 through 6 of the Detailed Summary Page for the 2010 Year End Report electronically filed by Robbie Wills for Congress and Jerry Adams, in his official capacity as Treasurer. According to the Commission's records, the report covers the period from October 1 through December 31, 2010 and was received on April 25, 2011. Line 16, column A lists \$5,221.74 in total receipts for the period. Lines 22, column A lists \$5,814.46 in total disbursements for the period.
4. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed at Washington on the 29th of June, 2011.



Dayna C. Brown
Reviewing Officer
Office of Administrative Review
Federal Election Commission

RECEIVED
FEC CENTER
2010 APR 21 AM 8:20

FEC
FORM 1

STATEMENT OF ORGANIZATION

Office Use Only

1. NAME OF
COMMITTEE (in full)

☐

(Check if name
is changed)

Example: If typing, type
over the lines.

12FE4M5

ROBBIE WILLS FOR CONGRESS

ADDRESS (number and street)

P.O. BOX 3742

☐

(Check if address
is changed)

LITTLE ROCK

AR

72209

CITY

STATE

ZIP CODE

COMMITTEE'S E-MAIL ADDRESS (Please provide only one e-mail address)

☐

(Check if address
is changed)

COMMITTEE'S WEB PAGE ADDRESS (URL)

☐

(Check if address
is changed)

WWW.ROBBIEWILLS.COM

2. DATE

04 / 03 / 2010

3. FEC IDENTIFICATION NUMBER

C00474700

4. IS THIS STATEMENT

☐

NEW (N)

OR

☒

AMENDED (A)

I certify that I have examined this Statement and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer

Jerry Adams

Signature of Treasurer

Jerry Adams

Date

04 / 03 / 2010

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. §437g.

ANY CHANGE IN INFORMATION SHOULD BE REPORTED WITHIN 10 DAYS.

Office
Use
Only

For further information contact:
Federal Election Commission
Toll Free 800-424-9530
Local 202-694-1100

FEC FORM 1
(Revised 02/2009)

11092670745

10030311098

6. Name of Any Connected Organization, Affiliated Committee, Joint Fundraising Representative, or Leadership PAC Sponsor

ZIP CODE

Relationship: ☐ Connected Organization ☐ Affiliated Committee ☐ Joint Fundraising Representative ☐ Leadership PAC Sponsor

- ZIP CODE**

Telephone number

**FEC
FORM 3****REPORT OF RECEIPTS
AND DISBURSEMENTS**

For An Authorized Committee

Office Use Only

1. NAME OF
COMMITTEE (in full)USE FEC MAILING LABEL
OR TYPE OR PRINT ▼Example: If typing, type
over the lines

ROBBIE WILLS FOR CONGRESS

ADDRESS (number and street)

PO BOX 3742

Check if different
than previously
reported. (ACC)

LITTLE ROCK

AR

72203

2. FEC IDENTIFICATION NUMBER ▼

CITY ▲

STATE ▲

ZIP CODE ▲

STATE ▼ DISTRICT

C00474700

3. IS THIS
REPORT

X

NEW
(N)

OR

AMENDED
(A)

AR

02

4. TYPE OF REPORT (Choose One)

(a) Quarterly Reports:

April 15 Quarterly Report (Q1)

July 15 Quarterly Report (Q2)

October 15 Quarterly Report (Q3)

X January 31 Year-End Report (YE)

Termination Report (TER)

(b) 12-Day PRE-Election Report for the:

Primary (12P)

General (12G)

Runoff (12R)

Convention (12C)

Special (12S)

Election on

in the
State of

(c) 30-Day POST-Election Report for the:

General (30G)

Runoff (30R)

Special (30S)

Election on

in the
State of

5. Covering Period

10

01

2010

through

12

31

2010

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer

Jerry Adams

Signature of Treasurer

Electronically Filed by Jerry Adams

Date

04

25

2011

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C 437g.

Office
Use
Only**FEC FORM 3**
(Revised 02/2003)

FESAN018

11092670747

POST-ELECTION DETAILED SUMMARY PAGE

FEC Form 3 (Revised 07/05)

Report of Receipts and Disbursements

3 / 14

- . If the candidate participated in the general election, use this form for the 30-day Post-General report.
 . If the candidate did NOT participate in the general election, use this form for the Year-end report covering through December 31 of the election year (due on January 31).

This form is used in lieu of filling out Line Numbers 6 through 7 on Page 2 (Summary Page) and Pages 3 and 4 (the Detailed Summary Page) for the last report filed by a candidate during the current election cycle.

Write or Type Committee Name

ROBBIE WILLS FOR CONGRESS

Report Covering the Period: From: M M D D Y Y Y Y To: M M D D Y Y Y Y
 1 0 0 1 2 0 1 0 1 2 3 1 2 0 1 0

I. RECEIPTS

COLUMN A Total this Period	COLUMN B Election Cycle Total as of	COLUMN C Total for
	M M D D Y Y Y Y 1 1 0 5 2 0 1 0 (date of general election)	M M D D Y Y Y Y 1 1 0 6 2 0 1 0 (date after general election)
		through
		M M D D Y Y Y Y 1 2 3 1 2 0 1 0 (last day of reporting period)
11. CONTRIBUTIONS		
(other than loans) FROM:		
(a) Individuals/Persons Other than Political Committees		
(i) Itemized (Use Schedule A)		
1000.00	0.00	0.00
(ii) Unitemized		
450.00	0.00	0.00
(iii) Total of contributions from individuals		
1450.00	0.00	0.00
(b) Political Party Committees		
0.00	0.00	0.00
(c) Other Political Committees		
0.00	0.00	0.00

**POST-ELECTION DETAILED
SUMMARY PAGE
Report of Receipts and Disbursements**

COLUMN A Total this Period	COLUMN B Election Cycle Total as of * (date of general Election) (* See page 5 for date)	COLUMN C Total for * (date after general election) Through * (last day of reporting period) (* See page 5 for dates)
(d) The Candidate		
0.00	0.00	0.00
(e) TOTAL CONTRIBUTIONS (other than loans) (add Lines 11(a)(iii), (b), (c) and (d))		
1450.00	0.00	0.00
12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES		
0.00	0.00	0.00
13. LOANS: (a) Made or Guaranteed by the Candidate		
3771.74	0.00	2254.38
(b). All Other Loans		
0.00	0.00	0.00
(c). TOTAL LOANS (add Lines 13(a) and (b))		
3771.74	0.00	2254.38
14. OFFSETS TO OPERATING EXPENDITURES (refunds, rebates, etc)		
0.00	0.00	0.00
15. OTHER RECEIPTS (Dividends, Interest, etc)		
0.00	0.00	0.00
16. TOTAL RECEIPTS (add 11(e), 12, 13(c), 14 and 15)		
5221.74	0.00	2254.38

POST ELECTION DETAILED SUMMARY PAGE

FEC Form 3 (Revised 1/01)

Report of Receipts and Disbursements

5 / 14

Write or Type Committee Name

ROBBIE WILLS FOR CONGRESS

Report the covering period

From:

10

01

2010

To:

12

31

2010

II. DISBURSEMENTS

COLUMN A Total this period	COLUMN B Election Cycle Total as of * (date of general election) (* See page 5 for date)	COLUMN C Total for * Through * (date after general election) (last day of reporting period) (* See page 5 for date)
17. OPERATING EXPENDITURES		
4064.46	0.00	2546.83
18. TRANSFER TO OTHER AUTHORIZED COMMITTEES		
0.00	0.00	0.00
19. LOAN PAYMENTS		
(a) Of Loans Made or Guaranteed by the Candidate		
1750.00	0.00	1750.00
(b) Of All Other Loans		
0.00	0.00	0.00
(c) TOTAL LOAN REPAYMENTS (add Lines 19(a) and 19(b))		
1750.00	0.00	1750.00
20. REFUNDS OF CONTRIBUTIONS TO:		
(a) Individuals/Persons Other Than Political Committees		
0.00	0.00	0.00
(b) Political Party Committees		
0.00	0.00	0.00

POST ELECTION DETAILED
SUMMARY PAGE

FEC Form 3 (Revised 1/01)

Report of Receipts and Disbursements

6 / 14

COLUMN A Total this period	COLUMN B Election Cycle Total as of * (date of general election) (* See page 5 for date)	COLUMN C Total for * Through * (date after general election) (last day of reporting period) (* See page 5 for date)
(c) Other political committees (such as PACs)		
0.00	0.00	0.00
(d) TOTAL CONTRIBUTION REFUNDS (See Lines 20(a), (b) and (c))		
0.00	0.00	0.00
21. OTHER DISBURSEMENTS		
0.00	0.00	0.00
22. TOTAL DISBURSEMENTS (add lines 17, 18, 19(c), 20(d), and 21)		
5814.46	0.00	4296.83
III. NET CONTRIBUTIONS (OTHER THAN LOANS)		
(Note: Substitute in lieu of Line #6 of Summary Page for this report only; subtract line 20(d) from Line 11(e))		
1450.00	0.00	0.00
IV. NET OPERATING EXPENDITURES		
(Note: Substitute in lieu of Line #7 of Summary Page for this report only; subtract line 14 from Line 17)		
4064.46	0.00	2546.83
V. CASH SUMMARY		
23. CASH ON HAND AT BEGINING OF REPORTING PERIOD		1826.33
24. TOTAL RECEIPTS AT THIS PERIOD (from Line 16).....		5221.74
25. SUBTOTAL(add Line 23 and Line 24)		7048.07
26. TOTAL DISBURSEMENTS AT THIS PERIOD (from Line 22).....		5814.46
27. CASH ON HAND AT CLOSE OF REPORTING PERIOD (Subtract Line 26 from Line 25).....		1233.61



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

VIA EXPRESS MAIL

June 30, 2011

Jerry Adams, in his official capacity as Treasurer
Robbie Wills for Congress
P.O. Box 3742
Little Rock, AR 72203

C00474700
AF# 2456

Dear Mr. Adams:

On April 1, 2011, the Federal Election Commission ("Commission") found reason to believe ("RTB") that Robbie Wills for Congress and you, in your official capacity as Treasurer ("respondents"), violated 2 U.S.C. § 434(a) for failing to file the 2010 Year End Report. The Commission also made a preliminary determination that the civil money penalty was \$8,800 based on the schedule of penalties at 11 C.F.R. § 111.43.

After reviewing the written response and any supplemental information submitted by you and Commission staff, the Reviewing Officer has recommended that the Commission make a final determination in this matter. A copy of the Reviewing Officer's recommendation is attached.

You may file with the Commission Secretary a written response to the recommendation within 10 days of the date of this letter. Your written response should be sent to the Commission Secretary, 999 E Street, NW, Washington, DC 20463. As a result of the anthrax threat in the Washington, DC area, US Postal Service mail delivery to federal agencies, including the Commission, has been interrupted. Until regular mail delivery resumes, you may also file your written response with the Commission Secretary via facsimile (202-208-3333) or by courier at the same address (if you use an overnight delivery service, please use zip code 20004 instead of zip code 20463). Please include the AF # in your response. Your response may not raise any arguments not raised in your original written response or not directly responsive to the Reviewing Officer's recommendation. 11 C.F.R. § 111.36(f). The Commission will then make a final determination in this matter.

Please contact me at the toll free number 800-424-9530 (press 0, then press 1660) or 202-694-1660 if you have any questions.

Sincerely,

Dayna C. Brown
Reviewing Officer
Office of Administrative Review

Attachment
cc: Robert Dale Wills, Jr., Candidate

Conway, AR 72034

11092670752



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

2011 JUL 22 P 1:35

July 22, 2011

MEMORANDUM

SENSITIVE

11092670753

To: The Commission

for Through: Alec Palmer *[Signature]*
Acting Staff Director

From: Patricia Carmona *[Signature]*
Chief Compliance Officer

Dayna C. Brown *[Signature]*
Reviewing Officer
Office of Administrative Review

Subject: Errata - Final Determination Recommendation in AF# 2456 – Robbie Wills for Congress and Robbie Wills, in his official capacity as Treasurer (C00474700)

The Office of Administrative Review submits an Errata to the Final Determination Recommendation circulated to the Commission on July 19, 2011 in order to reflect the Committee's change in Treasurer. The original named Robbie Wills for Congress and Jerry Adams, in his official capacity as Treasurer, as respondents in the matter. In a May 10 phone call to the Candidate, the Reviewing Officer advised that an Amended Statement of Organization was required to be filed disclosing the Candidate as Treasurer if he wished to assume responsibility for all Commission compliance following the resignation of the Committee's Treasurer, as indicated in his May 10 challenge. On July 15, the respondents filed an Amended Statement of Organization disclosing the Candidate, Robbie Wills as Treasurer. Based on this amendment, the respondents in the matter are now Robbie Wills for Congress and Robbie Wills, in his official capacity as Treasurer.

On April 1, 2011, the Commission found reason to believe ("RTB") that the respondents violated 2 U.S.C. § 434(a) for failing to file the 2010 Year End Report. As a result, the Commission also made a preliminary determination that the civil money penalty was \$8,800 based on the schedule of penalties at 11 C.F.R. § 111.43.

On April 25, 2011, the respondents filed the Year End Report, and disclosed \$5,221.74 in total receipts and \$5,814.46 in total disbursements. Had the report been filed disclosing this level of activity (\$11,036.20) prior to the Commission's RTB finding, the

civil money penalty would have been \$550 based on the schedule of penalties at 11 C.F.R. § 111.43(a).

On May 10, 2011, the Commission received the respondents' written response ("challenge"). After reviewing the challenge, the Reviewing Officer's recommendation dated June 29, 2011 was forwarded to the Commission, a copy was sent to the respondents, and is hereby incorporated by reference. The Reviewing Officer recommended that the Commission make a final determination that they violated 2 U.S.C. § 434(a) and based on the actual level of activity for the Year End reporting period (\$11,036.20), assess a civil money penalty of \$550 because they submitted no evidence that a factual error was made in the RTB finding, that the penalty was miscalculated at RTB or that they used best efforts to file on time. 11 C.F.R. § 111.35(b).

Within 10 days of transmittal of the recommendation, the respondents may file a written response with the Commission Secretary which may not raise any arguments not raised in the respondents' challenge or not directly responsive to the Reviewing Officer's recommendation. 11 C.F.R. § 111.36(f). As of this date, a written response has not been received.

OAR Recommendations

- (1) Adopt the Reviewing Officer recommendation for AF# 2456 involving Robbie Wills for Congress and Robbie Wills, in his official capacity as Treasurer, in making the final determination;
- (2) Make a final determination in AF# 2456 that Robbie Wills for Congress and Robbie Wills and, in his official capacity as Treasurer violated 2 U.S.C. § 434(a) and, based on the actual level of activity disclosed on the Year End Report (\$11,036.20), assess a civil money penalty of \$550 (reduced from the RTB civil money penalty of \$8,800); and
- (3) Send the appropriate letter.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Final Determination Recommendation --) AF 2456
Robbie Wills for Congress and Robbie)
Wills, in his official capacity as Treasurer)
(C00474700))

CERTIFICATION

I, Shawn Woodhead Werth, Secretary and Clerk of the Federal Election Commission, do hereby certify that on July 28, 2011, the Commission decided by a vote of 4-0 to take the following actions in AF 2456:

1. Adopt the Reviewing Officer recommendation for AF# 2456 involving Robbie Wills for Congress and Robbie Wills, in his official capacity as Treasurer, in making the final determination.
2. Make a final determination in AF# 2456 that Robbie Wills for Congress and Robbie Wills, in his official capacity as Treasurer, violated 2 U.S.C. § 434(a) and, based on the actual level of activity disclosed on the Year End Report (\$11,036.20), assess a civil money penalty of \$550 (reduced from the RTB civil money penalty of \$8,800).
3. Send the appropriate letter.

Commissioners Bauerly, McGahn II, Petersen, and Weintraub voted affirmatively for the decision. Commissioners Hunter and Walther did not vote.

Attest:

July 29, 2011
Date

Shawn Woodhead Werth
Shawn Woodhead Werth
Secretary and Clerk of the Commission

11092670755



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 3, 2011

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Robbie Wills, in official capacity as Treasurer
Robbie Wills for Congress
P.O. Box 3742
Little Rock, AR 72203

C00474700
AF# 2456

Dear Mr. Wills:

On April 1, 2011, the Federal Election Commission ("the Commission" found reason to believe that Robbie Wills for Congress and Jerry Adams, in his official capacity as Treasurer, violated 2 U.S.C. § 434(a) for failing to file the 2010 Year End Report. By letter dated April 4, 2011, the Commission sent you notification of the RTB finding that included a civil money penalty calculated at RTB of \$8,800 in accordance with the schedule of penalties at 11 C.F.R. § 111.43. On May 10, 2011, the Office of Administrative Review received the written response from you challenging the RTB civil money penalty.

The Reviewing Officer reviewed the Commission's RTB finding with its supporting documentation and your written response. Based on this review, the Reviewing Officer recommended that the Commission reduce the RTB civil money penalty because it was calculated using an estimated level of activity, make a final determination that Robbie Wills for Congress and Jerry Adams, in his official capacity as Treasurer, violated 2 U.S.C. § 434(a) and, based on the actual level of activity disclosed on the Year End Report filed April 25, 2011 (\$11,036.20), assess a civil money penalty in the amount of \$550 in accordance with 11 C.F.R. § 111.43. The basis for the Reviewing Officer's recommendation was included in the Final Determination Report, a copy of which was sent to you on June 30, 2011.

On July 28, 2011, the Commission adopted the Reviewing Officer's recommendation, made a final determination that Robbie Wills for Congress and you, in your official capacity as Treasurer, violated 2 U.S.C. § 434(a) and based on the level of activity disclosed on the 2010 Year End Report (\$11,036.20), assessed a civil money penalty of \$550 (reduced from the RTB civil money penalty of \$8,800). It is based on the same factors used to calculate the civil money penalty at RTB except that the actual rather than the estimated level of activity was used. A copy of the final determination memorandum is attached.

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If You Choose to Appeal the Final Determination and/or Civil Money Penalty

If you choose to appeal the final determination, you should submit a written petition, within 30 days of receipt of this letter, to the district court of the United States for the district in which the committee or treasurer reside, or transact business, requesting that the final determination be modified or set aside. See 2 U.S.C. § 437g(a)(4)(C)(iii). The failure to raise an argument in a timely fashion during the administrative process shall be deemed a waiver of the respondents' right to present such argument in a petition to the district court under 2 U.S.C. § 437g. 11 C.F.R. § 111.38.

If You Choose Not to Pay the Civil Money Penalty and Not to Appeal

Unpaid civil money penalties assessed through the Administrative Fine regulations will be subject to the Debt Collection Act of 1982 ("DCA") as amended by the Debt Collection Improvement Act of 1996 ("DCIA"), 31 U.S.C. § 3701 et seq. If you do not pay this debt within 30 days (or file a written petition to a federal district court - see below), the Commission will transfer the debt to the U.S. Department of the Treasury ("Treasury") for collection. Within 5 days of the transfer to Treasury, Treasury will contact the debtor and request payment. Treasury currently charges a fee of 28% of the civil money penalty amount for its collection services. The fee will be added to the amount of the civil money penalty that you owe. Should Treasury's attempts fail, Treasury will refer the debt to a private collection agency ("PCA"). If the debt remains unpaid, Treasury may recommend that the Commission refer the matter to the Department of Justice for litigation.

If You Choose to Pay the Civil Money Penalty

If you should decide to pay the civil money penalty, send the enclosed form and payment to the address on page 3 within 30 days of receipt of this letter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. The file will be made a part of the public record pursuant to 11 C.F.R. § 111.42(b). Although the file must be placed on the public record within 30 days from the date of the Commission's notification, this could occur at any time following certification of the Commission's vote.

If you have any questions regarding the payment of the civil money penalty, please contact Dayna Brown on our toll free number (800)424-9530 (press 0, then ext. 1660) or (202)694-1660.

On behalf of the Commission,


Cynthia L. Bauerly
Chair

Attachment

ADMINISTRATIVE FINE PAYMENT INSTRUCTIONS

In accordance with the schedule of penalties at 11 C.F.R. § 111.43, the civil money penalty is \$550 for the Year End Report.

This penalty should be paid by check or money order, made payable to the Federal Election Commission. It should be sent by mail to:

Federal Election Commission
PO Box 979058
St. Louis, MO 63197-9000

If you choose to send your payment by courier or overnight delivery, please use this address:

U.S. Bank - Government Lockbox
FEC # 979058
1005 Convention Plaza
Attn: Government Lockbox, SL-MO-C2GL
St. Louis, MO 63101

The form and payment are due within 30 days of receipt of this letter.

PAYMENTS BY PERSONAL CHECK

Personal checks will be converted into electronic funds transfers (EFTs). Your account will be electronically debited for the amount on the check, usually within 24 hours, and the debit will appear on your regular statement. We will destroy your original check and keep a copy of it. In case the EFT cannot be processed for technical reasons, you authorize us to process the copy in lieu of the original check. Should the EFT not be completed because of insufficient funds, we may try to make the transfer twice.

PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT

FOR: Robbie Wills for Congress

FEC ID#: C00474700

AF#: 2456

PAYMENT AMOUNT DUE: \$550

FOR: Robbie Wills for Congress

FEC ID#: C00474700

AF#: 2456

PAYMENT AMOUNT DUE: \$550

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QUALITY IS OUR PRIORITY FOR LOCKBOX 9058
SEQ# 002 \$ 0000055000 BA# 1 08-29-11 20 4



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us bancorp.
The Bancorp Company

10776

 **WILLS LAW FIRM, PLLC**
P.O. BOX 306
CONWAY, AR 72033
PH. (501) 329-3179

USBANK
81-54-820

8/26/2011

 Federal Election Commission \$ 550.00

Five Hundred Fifty and 00/100 DOLLARS

Federal Election Commission

MEMO Fine for late year-end report *mon*

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FEDERAL ELECTION COMMISSION
Washington DC 20463

THIS IS THE END OF ADMINISTRATIVE FINE CASE # 2456

DATE SCANNED 10-5-11

SCANNER NO. 2

SCAN OPERATOR Cmw

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